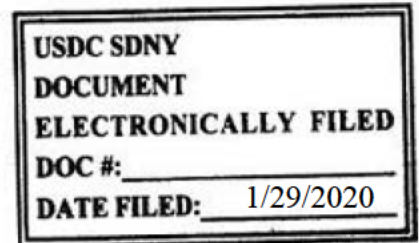


**GODDARD LAW PLLC**  
39 BROADWAY, SUITE 1540  
NEW YORK, NEW YORK 10006  
O:(646) 504-8363  
C:(504) 909-0792  
F:(212) 473-8705  
megan@goddardlawnyc.com



January 28, 2020

**VIA ECF**

Hon. Analisa Torres  
United States District Court Judge  
Southern District of New York  
500 Pearl Street, 15D  
New York, New York 10007

Re: *Viviana Espinosa v. Weill Cornell Medical College*  
Civil Action No. 18-cv-11665

Dear Honorable Analisa Torres:

This firm represents Plaintiff Viviana Espinosa ("Plaintiff") in the matter referenced above. I write jointly with Defendant's counsel to respectfully request an extension of the deadline for submission of the pre-motion letter for dispositive motion practice and the accompanying Local Civil Rule 56.1 Statement of Undisputed Facts ("56.1 Statement"), and Plaintiff's Counter Statement of Undisputed Facts ("Counter 56.1 Statement"). This is the parties' second request to extend the pre-motion letter deadline.

The current deadline for the pre-motion letter and the accompanying 56.1 Statement and Counter 56.1 Statement is February 4, 2020. Defendant has been diligently drafting its 56.1 Statement. However, despite multiple efforts to contact the court reporting company, to date, the Parties have not received the transcript of the deposition of Jamal Lopez—a witness with integral testimony relevant to the matter. As such, Defendant is unable to complete its 56.1 Statement to send to Plaintiff for her Counter 56.1 Statement.

The parties will not receive Mr. Lopez transcript until Tuesday, January 28, 2020 at the earliest. In that instance, Defendant has represented to Plaintiff that it will not be able to provide its 56.1 Statement to Plaintiff until Thursday, January 30, 2020. This will give Plaintiff's counsel only three (3) days to review the 56.1 Statement and draft Plaintiff's Counter 56.1 Statement before the current deadline of February 4, 2020.

As Defendant has had more than two (2) weeks to complete its 56.1 Statement, Plaintiff respectfully requests that Plaintiff also be provided with two (2) weeks to complete her Counter 56.1 Statement following the date that Defendant provides her with the 56.1 Statement, which will occur no later than two (2) business days after Defendant receives Mr. Lopez's deposition transcript from Plaintiff.

Plaintiff also informs the Court that the firm's Principal Attorney is out on medical leave for two weeks, until February 8, 2020, thereby leaving us short staffed. Plaintiff thereby requests that the deadline for submitting the pre-motion letter and the accompanying 56.1 Statement and Counter 56.1 Statement be extended to February 18, 2020.

I am available to discuss this matter with the Court at Your Honor's convenience.

Respectfully submitted,

GODDARD LAW PLLC  
*Attorney for Charging Party*

By: /s/ Megan S. Goddard  
Megan S. Goddard, Esq.  
39 Broadway, Suite 1540  
New York, NY 10006  
Office: 646-504-8363

cc: Benjamin Stockman  
All Counsel of Record (via ECF)

GRANTED. The deadline for submitting the pre-motion letter and accompanying 56.1 Statement and Counter 56.1 Statement is EXTENDED to **February 18, 2020**.

It is further ORDERED that the case management conference scheduled for February 6, 2020 is  
ADJOURNED *sine die*.

SO ORDERED.

Dated: January 29, 2020  
New York, New York



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ANALISA TORRES  
United States District Judge